

**NOTE: The full Environmental Quality Service Council  
has not yet voted on the content of this report**

**ENVIRONMENTAL QUALITY SERVICE COUNCIL**

**IDEM STAFFING SUBCOMMITTEE RECOMMENDATIONS**

[This report was presented at the October 9, 1998 EQSC meeting]

**I. Specific IDEM Staffing Recommendations**

A. Immediate need for additional staff is most severe in the Office of Water Management and the Office of Environmental Response.

1. The water quality monitoring and permitting staff should be increased to the current budget manning table level of 289 from its current staffing level of 227 (including temporary staff). This staff level is needed to increase monitoring, develop scientifically sound water quality data, and eliminate the backlog of NPDES permits.

2. The Office of Environmental Response staff should be increased to the current budget manning table level of 160 from its current staffing level of 124 (including temporary staff). There are existing needs in emergency response, state clean up (high risk clean up sites), the voluntary remediation program (VRP), and the developing RISC Program.

B. The Office of Solid and Hazardous Waste staff numbers have declined in recent years. Staff should be manned at the 1996 level of 184 positions to perform current responsibilities.

C. Future responsibilities assigned to IDEM by both the federal government and the Indiana General Assembly will create future needs in staffing.

1. In the Office of Air Management, the Title V and State Implementation Plans for Particulate Matter 2.5 and ozone will create a demand for additional technically sophisticated air pollution control staff.

2. In the Office of Water Management, non-point source pollution issues will require additional staff in the near future.

**II. General State Agency Staffing Recommendations**

A. High level scientific, engineering, and other positions requiring technical expertise should be reevaluated with regard to legitimately competitive salaries for the recruitment and retention of qualified personnel. For example, in IDEM chemists, toxicologists, and environmental attorneys should be reassessed and upgraded to recognize the necessary special acquired skills. These positions are currently assessed against non-comparable positions such as lab-bench chemists and general practice

attorneys.

B. The State Personnel Department should be urged to recognize that the pressure on state agencies to hire additional numbers of staff may create a tendency to lower qualifications. The State Personnel Department must make an effort to ensure that minimum qualifications reflect appropriate levels of education and experience for scientific, technical, and legal staff positions.

C. As previously recommended by a General Assembly study committee and agreed to by IDEM, the State Personnel Department should establish a dual career track for professional positions with substantial regular advancement in compensation accrued from experience and competence in the same area. This will enable IDEM and other departments to recruit and maintain fully competent technical staff in non-managerial career ladders. A system analogous to the federal civil service ranking system should be considered.

D. "Temporary" positions and contract employees should only be utilized for truly temporary work or short term projects. In general, the use of "temporary" positions results in lower staff morale, the lack of consistency, and the loss of invaluable institutional memory. While it may save a few dollars and make state government appear smaller in the short term, in the long term it is "penny-wise and pound-foolish."

### III. Related Issues

A. Water and waste permit fees were increased by the General Assembly in 1994 to provide funding from the regulated community for the processing of permits in a timely manner. The formula, which was established at a 60%/40% ratio, has allowed the hiring of additional staff to deal with the technicalities of permits and to work through all backlogs. Currently, approximately \$9 million has accumulated in the nonreverting permit fee fund. Legislation should be adopted to establish a system similar to the Clean Air Act permit fee fund accountability mechanism to ensure that the fee fund balance is maintained at a reasonable level and that the monies are used to achieve the identified objectives.

B. An independent external analysis should be conducted to consider whether the number of IDEM employees and the quality of IDEM employees are sufficient to meet the environmental policies and priorities of the administration and the General Assembly.